

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Daniel LaRock

Case No. 5:24-MJ-553 (MJK)

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of June 29, 2024 in the county of Oswego in the Northern District of New York the defendant(s) violated:

*Code Section*

Title 18, U.S.C., Sections  
2252A(a)(2)(A) and (b)(1).

*Offense Description*

Distribution of Child Pornography.

This criminal complaint is based on these facts:  
See Attached Affidavit.

☒ Continued on the attached sheet.

NICHOLAS R  
HUGHES

Digitally signed by NICHOLAS R  
HUGHES  
Date: 2024.11.26 12:47:53 -05'00'

*Complainant's signature*

Nicholas Hughes, DHS Special Agent

*Printed name and title*

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 11/26/2024


*Judge's signature*

City and State: Syracuse, New York

Hon. Mitchell J. Katz, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Nicholas Hughes, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Department of Homeland Security, U.S. Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”) and have been since March 2022. I have successfully completed the Criminal Investigative Training Program and the HSI Special Agent Training at the Federal Law Enforcement Training Center in Brunswick, Georgia. While in those programs, I received training in investigations related to child exploitation, human exploitation, narcotics, smuggling, immigration, and other criminal activity. Prior to working as a Special Agent, I was a United States Border Patrol Agent in San Diego, California. I also have a Bachelor of Science Degree in Homeland Security.

2. As part of my duties as an HSI agent, I actively investigate criminal violations relating to the exploitation of children including violations pertaining to the distribution, possession, receipt, and trafficking of child pornography in violation of federal law. I have received additional training regarding child pornography and have had the opportunity to observe and review numerous examples of child pornography in many forms, including video and computer media.

3. I make this affidavit in support of an application for a criminal complaint charging Daniel LAROCK (DOB 09/11/2003) with distribution of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A) and (b)(1).

4. The statements contained in this affidavit are based upon my investigation and information provided to me by other agents. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause

to believe that the defendant has violated 18 U.S.C. § 2252A(a)(2)(A), and distributed child pornography.

### **PROBABLE CAUSE**

5. LAROCK is a Level III sex offender and has a prior conviction under New York law for promoting a sexual performance by a child less than 17 years of age, in violation of New York Penal Law Section 263.15. He was convicted on June 11, 2024, in Oswego County Court, and sentenced to probation for 10 years. This prior conviction impacts the penalty provisions in 18 U.S.C. § 2252A(b)(1).

6. This federal investigation started because law enforcement received four cyber tips from the National Center for Missing and Exploited Children (“NCMEC”) related to a common target that was later identified as LAROCK. Specifically, cyber tip #195959075 (Discord), #195981301 (Discord), #195949100 (Snapchat), and #197099074 (Instagram).

### **Discord Cyber Tips and Distribution of Child Pornography**

7. Discord cyber tip #195959075 notes that, on June 29, 2024, the account uploaded one file through Discord servers. The file is a video with the file name ending in a527 .mp4. The video is approximately 44 seconds in length and depicts a prepubescent minor female approximately 9 to 11 years old, who is fully nude from the waist down and is digitally stimulating her vagina.

8. Discord cyber tip #195981301 notes that, on June 29, 2024, the target account uploaded 18 files through Discord servers. One file is a video with the file name ending in 1132.mp4. The video is approximately 2 seconds long and depicts a pubescent minor female approximately 12-14 years old, who is fully nude and is shown penetrating her vagina with a long silver object.

9. Discord cyber tips #19595075 and #195981301 were both related to the same account. The cyber tips included information regarding the user of the account including an email address and

phone number. Law enforcement obtained information from AT&T related to the associated phone number and confirmed that LAROCK owns the phone number. I also confirmed with LAROCK's probation officer that he provided this phone number as his cell phone. Law enforcement served legal process to Google for the associated email address, bravado[REDACTED]. The username associated with the email is "Bravado Bravado" and the phone number listed on the email account is the same phone number associated with the cyber tips.

10. On October 22, 2024, pursuant to a search warrant, Discord provided the content contained within the account associated with the cyber tips. The two aforementioned videos containing child sexual abuse material were contained within the "attachments" folder provided by Discord. In addition, there were numerous selfie images and videos of LAROCK. I know that these images depict LAROCK because I have seen his photo in the sex offender database. On June 25, 2024, LAROCK had a conversation with another user on the platform wherein he provides his name as "Daniel" "Larock" and says he lives in upstate New York.

11. Based on the direct message conversations, the selfie images, the phone number, and the email address, it is my conclusion that the Discord account associated with the cyber tips belongs to and is used by LAROCK.

12. On June 29, 2024, the images associated with the cyber tips discussed in paragraphs 7 and 8, along with other videos depicting child pornography, were uploaded and distributed to another user, with user name me[REDACTED] utilizing the direct message feature on Discord. During the conversation, LAROCK says that the videos depict children that are "12" or "16" and he knew the ages because the person who gave him these videos told him the ages. Based on the foregoing, there is probable cause to believe that LAROCK violated 18 U.S.C. 2252A(a)(2)(A) because he knowingly sent videos of child pornography to another person over the internet using his Discord account.

**Snapchat Cyber Tip and Distribution of Child Pornography**

13. Snapchat cyber tip #195949100 notes that on June 28, 2024, the target account uploaded two files through Snapchat servers. I have reviewed each file. One file is a video file ending in tbc3.mp4 which is approximately 28 seconds in length. The video depicts two pubescent minor females who are approximately 14-16 years old and depicts one minor female performing oral sex on the other minor female.

14. Cyber tip #195949100 included subscriber information about the target account including an email address and phone number. Law enforcement obtained information from AT&T related to the associated phone number and confirmed that LAROCK owns the phone number. This is the same phone number as was associated with the Discord cyber tips described above and is the phone number LAROCK provided probation. Law enforcement served legal process to Google for the associated email address, bravado[REDACTED]. The username associated with the email is “Bravado Bravado” and the phone number listed on the email account is the same phone number associated with the cyber tips.

15. On October 30, 2024, pursuant to a search warrant, Snapchat provided the content of the account associated with the cyber tip. The cyber tip video described above was saved in the account along with numerous selfie images and videos of LAROCK. In one conversation with another Snapchat user, LAROCK asks the user if they remember someone named “Daniel Larock.”

16. Based on the direct message conversations, the selfie images, and the phone number, it is my conclusion that the Snapchat account associated with the cyber tip belongs to and is used by LAROCK.

17. Within the Snapchat account, there were numerous videos containing child sexual

abuse material. For example, there is a video file, which is approximately 31 seconds in length that depicts an adult male penetrating a 7–9-year-old female’s vagina. In addition, there is a video file which is approximately 27 seconds in length and depicts an adult male exposing his penis and attempting to penetrate the vagina of an approximately 4–6-year-old minor female. Further, there is a video file, which is approximately 13 seconds in length that depicts an approximately 5-7 years old male performing oral sex on an approximately 5–7-year-old female.

18. According to the Snapchat records, on June 28, 2024, LAROCK used the internet to distribute the three videos described in paragraph 17, and other videos of child pornography, to another user with username la[REDACTED], via Snapchat’s direct message function. During the conversation, LAROCK appears to be sending these videos in anticipation of receiving a “mega” link.<sup>1</sup> Based on the foregoing, there is probable cause to believe that LAROCK violated 18 U.S.C. 2252A(a)(2)(A), because he sent videos of child pornography over the internet to another user using his Snapchat account.

#### **Instagram Cyber Tip and Distribution of Child Pornography**

19. Instagram cyber tip #197099074 notes that on July 27, 2024, the target account uploaded six files through Instagram servers. NCMEC categorized two files as “Apparent Child Pornography,” and three as “Child Unclothed.” One of those media files is a video approximately 14 seconds in length that depicts an adult male anally penetrating a prepubescent minor female who is approximately 7-9 years old.

20. Cyber tip #197099074 included subscriber information about the target account including an email address and IP address. Law enforcement served legal process to Google for the

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<sup>1</sup> Based on my training and experience, I believe the reference to a “mega” link is to the file-sharing website MEGA. MEGA is notoriously used by people to send and receive child pornography.

associated email address, brava[REDACTED]. Law enforcement obtained records from Google, which returned to a user named “Bravado Bravado.” The phone number linked to this email address is the same phone number associated with the Discord and Snapchat cyber tips and is associated with LAROCK. The cyber tip provided the following IP addresses: 2603:7080:f7f0:220:ded8:70a0:ec1a:4125 and 2603:7080:f7f0:220:ded8:70a0:ec1a:4125. Law enforcement obtained information from Charter related to the associated IP addresses, which resolved to an address for Carol LaRock in Oswego, New York. Carol LaRock is LAROCK’s mother, and, according to LAROCK’s probation officer, LAROCK was living with his mom on July 27, 2024.

21. On November 11, 2024, pursuant to a search warrant, Instagram provided the content contained within the account associated with the cyber tip. The cyber tip video containing child sexual abuse material was saved in the account along with numerous selfie images and videos of LAROCK. Instagram also provided the date of birth for the account user, and it is the same as LAROCK’s date of birth. In the direct messages, the user of the account states that he lives in “upstate NY.”

22. Based on the direct message conversations, the selfie images, the phone number, the IP address, and the date of birth used, it is my conclusion that the Instagram account associated with the cyber tip belongs to and is used by LAROCK.

23. Contained within the Instagram account were additional videos containing child pornography that were not identified within the cyber tip report. For example, there is a video file, which is approximately 49 seconds in length that depicts a minor female who is approximately 9-11 years old digitally penetrating her vagina. In addition, there is a video which is approximately 6 seconds in length that depicts a minor female who is approximately 9-11 years old digitally penetrating her vagina.

24. The videos described in paragraph 23 were uploaded by LAROCK to Instagram servers on July 10, 2024, and then distributed to another user, alg[REDACTED], utilizing Instagram's direct message function. During the conversation, LAROCK states that the age of one of the children depicted in the videos is "10." Based on the foregoing, there is probable cause to believe that LAROCK violated 18 U.S.C. 2252A(a)(2)(A) because he sent videos of child pornography over the internet to another user using his Instagram account.

#### **Probation Search and Interview**

25. On November 26, 2024, I accompanied members of the Oswego County Probation department as they conducted a routine search of LAROCK's residence at 5240 US-11, RM17, Pulaski, NY 13142. The Probation officers searched LAROCK's residence pursuant to a condition of his supervision. I was present merely to observe the search and did not take part in the physical search of LAROCK's residence.

26. During the search, Probation officers discovered his personal cell phone, the Motorola G-Play 2024. LAROCK is subject to a condition of supervision that he only possess electronic devices that have been approved by probation and that have computer monitoring software installed.

27. While LAROCK's apartment was being searched, I spoke with LAROCK outside his apartment after providing him with *Miranda* warnings. LAROCK agreed to speak with law enforcement.

28. LAROCK admitted to owning the cell phone number associated with the previously mentioned cyber tips. LAROCK also admitted to possessing a Motorola G-Play 2024 cell phone, the same listed device associated with the Instagram warrant return.

29. LAROCK admitted to owning the Snapchat account associated with cyber tip #195949100. He



also admitted that he received, possessed, and distributed child pornography utilizing his Snapchat account.

LAROCK identified himself in numerous selfie images found on the Snapchat account. LAROCK was played a video file containing child pornography found in his Snapchat account (and described above) and admitted to remembering the video and identified the individuals in the video performing sexual acts as “toddlers.”

30. LAROCK admitted to owning the Instagram account associated with cyber tip #197099074. He admitted that he received, possessed, and distributed child pornography utilizing his Instagram account.

LAROCK identified himself in numerous selfie images found in his Instagram account. LAROCK was played a video file containing child pornography found in his Instagram account (and described above) and admitted to remembering the video and identified the minor in the video performing sexual acts as a “toddler.”

31. LAROCK admitted to owning the Discord account associated with cyber tips #195959075 and #195981301. He admitted that he received, possessed, and distributed child pornography utilizing his Discord accounts. LaRock was shown numerous selfie images, where he identified himself in the pictures. LAROCK was played a video file containing child pornography found in his Discord account (and described above) and admitted to remembering the video and identified the minor in the video performing sexual acts as a 13–14-year-old girl.

### **CONCLUSION**

32. Based on the above information, I respectfully request that the Court issue the proposed criminal complaint and sign the associated arrest warrant.

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.

NICHOLAS R  
HUGHES

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NICHOLAS R HUGHES  
Date: 2024.11.26  
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Nicholas Hughes  
Special Agent  
Homeland Security Investigations

I, the Honorable Mitchell J Katz., United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on November 26, 2024, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

  
Hon. Mitchell J. Katz  
United States Magistrate Judge